



VENABLE LLP | 1270 AVENUE OF THE AMERICAS
24TH FLOOR | NEW YORK, NY 10020
T +1 212.307.5500 F +1 212.307.5598 Venable.com

March 3, 2023

t 212.370.6289
f 212.307.5598
MBallard@Venable.com

FILED VIA ECF

Honorable Paul G. Gardephe
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square New York, NY 10007

Re: *Everytown for Gun Safety Action Fund, Inc. v. Defcad, Inc. et al.*, 21-cv-08704

Dear Judge Gardephe:

We write jointly on behalf of: (1) Plaintiff Everytown for Gun Safety Action Fund, Inc. (“Everytown”), (2) Settling Defendants Defcad, Inc, Odysee User xYeezySZN; Defcad User xYeezySZN; The Gatalog; Twitter User xYeezySZN and Phillip Royster, and (3) the Hartman & Winnicki, P.C. law firm (“Hartman”) concerning Hartman’s June 15, 2022 letter motion (“Request”) and September 6, 2022 supplemental letter motion (“Supplemental Request”) (together, the “Motion”) requesting to be relieved as counsel for Defendant Defcad User Freeman 1337 (“Freeman”). [ECF 109, 131].

As directed by the Court’s September 6, 2022 Order (ECF 133), Everytown previously submitted a letter in response to the Motion. *See* ECF 134.

We now write to advise the Court that Everytown consents to the relief sought in Hartman’s Motion, and all of the foregoing jointly request that the Court grant the Motion.

Respectfully submitted,

/s/Marcella Ballard

Cc: Counsel of Record via ECF